

EXHIBIT C

Load File Standards for Party Productions

ESI and hard copy document images will be produced as set forth above with appropriate load files, meeting the following specifications:

- OPTICON SAMPLE (Load file)
- 99529,VOL001,\IMAGES\00\00\00143221.TIF,Y,,,2
- 99529,VOL001,\IMAGES\00\00\00143222.TIF,,,,
- 124296,VOL001,\IMAGES\00\00\00143223.TIF,Y,,,3
- 124296,VOL001,\IMAGES\00\00\00143224.TIF,,,,
- 124296,VOL001,\IMAGES\00\00\00143225.TIF,,,,

Sample .DAT - Database Load File:

[illegible]

3. Native files will be produced in folders separate and distinct from the folders containing documents produced as TIFFs and will be accompanied by a cross- reference file containing the Bates number of and path to the native file as well as the metadata fields listed in Exhibit B to the extent they are available for and applicable to each document. The cross- reference file will use the delimiters identified in (2) above.
4. The .dat files should be encoded in UTF-16LE or UTF-8, in a best effort to preserve the integrity and full character set in use for any Japanese or other non- English text.

5. Production Media. Unless otherwise agreed, documents and ESI will be produced on encrypted optical media (CD/DVD), external hard drive, secure FTP site, or similar electronic format. Any production of ESI greater than 10 gigabytes shall be by hard drive. Such media should have an alphanumeric volume name; if a hard drive contains multiple volumes, each volume should be contained in an appropriately named folder at the root of the drive. Volumes should be numbered consecutively (e.g., ABC001, ABC002, etc.). Deliverable media should be labeled with the name of this action, the identity of the producing Party, and the following information: volume name, date of delivery, a technical contact (preferably whomever created the media item) so that the receiving party can resolve extraction issues should they arise, and where feasible, the Bates number range of the materials contained on the media item or other similar description of the item.
6. Encryption of Production Media. To maximize the security of information in transit, any media on which documents or electronic files are produced may be encrypted by the producing Party. In such cases, the producing Party shall transmit the encryption key or password to the requesting Party, under separate cover, contemporaneously with sending the encrypted media. The encryption method shall be disclosed prior to data transmission to ensure the receiving party has appropriate access to the encryption technology being used. The party will provide a named point of contact, and phone number so that any encryption or data access questions can be quickly and easily resolved. The receiving parties in this matter are on notice that certain data produced may originate from custodians in the European Union and the receiving parties therefore agree to follow the strictest security standards in guarding access to said data.
7. Designation of Custodians. Each production shall be accompanied by a notice of production. In such notice, the Producing Party shall identify the source(s) of ESI that contain responsive documents (e.g., custodial files, custodial location, or database productions). All productions will be produced with an index identifying the Bates range of each production. Productions otherwise need not include indication of the document request(s) to which a document may be responsive.
8. Inadvertent Production. The inadvertent production of any material constituting or containing attorney-client privileged information or work-product, or constituting or containing information protected by applicable privacy laws or regulations, shall be governed by provisions contained in the Protective Order entered in this action.